

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

**S.T.,**

Plaintiff,

**v.**

**CARSON LOOP ESM, LLC d/b/a  
BUDGETEL, and  
SRINIVAS BOLLEPALLI,**

Defendants.

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CASE NO. 4:24-CV-00225-WMR

**DEFENDANTS CARSON LOOP ESM LLC AND  
SRINIVAS BOLLEPALLI'S JOINT RESPONSE TO PLAINTIFF'S  
MOTION FOR LEAVE TO AMEND THE COMPLAINT**

COME NOW the Defendants, Carson Loop ESM LLC and Srinivas Bollepalli, by and through undersigned counsel, to submit their Joint Response to Plaintiff's Motion for Leave to Amend the Complaint (D.E. 40). Defendants recognize that Federal Rule of Civil Procedure 15(a)(2) permits amended pleadings "with the opposing party's written consent or the court's leave." Fed. R. Civ. P. 15(a)(2). Plaintiff has not sought Defendants' written consent to amend, however Defendants concede that this Court is to "freely give leave [to amend] when justice so requires." *Id.* As a result, Defendants do not oppose Plaintiff's Motion for Leave to Amend the Complaint.

This 8th day of July, 2025.

Respectfully submitted,

**CARR ALLISON**

By: /s/ Sean W. Martin  
**SEAN W. MARTIN, GA BAR #474125**  
**STEPHEN A. SWANSON, GA BAR #759751**  
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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), I hereby certify the foregoing document complies with the font and point selections permitted by Local Rule 5.1(B). This document was prepared on a computer using Times New Roman font in 14 point.

This 8th day of July, 2025.

By: /s/ Sean W. Martin  
**SEAN W. MARTIN, GA BAR #474125**  
**STEPHEN A. SWANSON, GA BAR #759751**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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By: /s/ Sean W. Martin  
**SEAN W. MARTIN, GA BAR #474125**  
**STEPHEN A. SWANSON, GA BAR #759751**